



# THE KREISS LAW FIRM

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December 13, 2021

Honorable Mary Kay Vyskocil  
United States District Judge  
Southern District of New York  
500 Pearl Street, Room 2230  
New York, NY 10007  
**SENT VIA ECF**

**Re.: United States v. Jorge Navarro**  
**20-CR-160-MKV**

Dear Judge Vyskocil,

I write on behalf of my client, Jorge Navarro, in reference to DE 582 submitted on his behalf. As it has been Mr. Navarro's intent to comply with the terms of his plea agreement since executing same, the request made for a variance pursuant to *United States v. Rodriguez*, 64 F. 3d 638. 643 (11th Cir. 1995) regarding the application of U.S.S.G. § 3E1.1 is respectfully withdrawn, as this argument was inadvertently included in his sentencing memorandum. Undersigned counsel has conferred with the government, who states that Mr. Navarro will be in compliance with the terms of his plea agreement based upon the withdrawal of the above-referenced argument.

Thank you for your consideration of this matter.

Respectfully submitted,

/s/ Jason W. Kreiss

Jason W. Kreiss, Esquire  
Attorney for Defendant Navarro

cc.: Assistant United States Attorneys  
Andrew Adams, Esq.  
Sarah Mortazavi, Esq.